## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF MISSOURI

JAMES MICHAEL ENGLISH  Debtor.	)	Case No. 10-30727
	)	Chapter 13
	)	
	)	

## **MOTION TO SELL**

COMES NOW the debtor, through counsel, and moves the court as follows:

- 1. Debtor filed for relief for Chapter 13 on June 25, 2010.
- 2. Debtor has an individual interested in purchasing his 2004 Iron Horse Texas Chopper for \$10,000.00.
- 3. Debtor proposes to pay Freedom Road Financial \$2,235.60 to payoff the claim secured by the motorcycle. Debtor will use the remaining funds to purchase a new motorcycle without incurring additional debt.
- 4. Debtor requests the time for notice of the motion be shortened to ten (10) days.
  - 5. The Trustee will take the customary fee on the sale transaction.
- 6. Objections and request for a hearing before the Bankruptcy Judge, if any, as to this motion must be in writing and filed with the clerk of the Bankruptcy Court and served upon the United States Trustee and the trustee of this Notice not later than 10 days after service of this Notice. Any objections not timely filed and served may be deemed waived.

WHEREFORE, Debtor requests this court enter an order allowing debtor to sell the 2004 American Iron Horse motorcycle and use the proceeds as above stated.

## CHECKETT & PAULY, P.C.

/s/ Mariann Morgan Mariann Morgan, #50083 517 S. Main Street P.O. Box 409 Carthage, MO 64836 (417)358-4049 Telephone (417)358-6341 Facsimile

## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served electronically to those parties who have entered an appearance in the court's Electronic Court Filing (ECF) System and conventionally, via first-class mail, postage prepaid, to those parties below, if any, who have requested notice but are not participating in the ECF System, and to all creditors on the debtor's mailing matrix, on the date entered on the court's docket.

/s/ Mariann Morgan
Attorney of Record